

In The Matter Of:
Caitlin O'Connor v.
The Lampo Group, LLC a/k/a Ramsey Solutions

Video Deposition of Caitlin O'Connor
June 22, 2021

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Video Deposition of Caitlin O'Connor - June 22, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CAITLIN O'CONNOR,)	
)	
Plaintiff,)	
)	No. 3:20-CV-00628
v.)	JUDGE RICHARDSON
)	
THE LAMPO GROUP, LLC a/k/a)	MAGISTRATE JUDGE
RAMSEY SOLUTIONS,)	FRENSLEY
)	
Defendant.)	JURY DEMAND

VIDEO DEPOSITION OF

CAITLIN O'CONNOR

Tuesday, June 22, 2021

Jennifer B. Carollo, LCR, RPR, CCR
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Video Deposition of Caitlin O'Connor - June 22, 2021

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APPEARANCES:

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Mr. Daniel Cortez
General Counsel at Ramsey
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Also Present: Mr. Armando Lopez

Reported By:
Jennifer B. Carollo, LCR, RPR, CCR

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All formalities as to caption, certificate, transmission, filing, etc., are waived. All objections except as to the form of the questions are reserved to on or before the hearing.

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1 MS. SANDERS: 14, okay.

2 (Marked [Exhibit 14.](#))

3 BY MS. SANDERS:

4 Q. One question about that, Ms. O'Connor. Do
5 you recall preparing that mission statement?

6 A. Yeah, I -- yeah.

7 Q. As you read this mission statement today, do
8 you think that it was accurate at the time that you
9 prepared it?

10 A. Yes.

11 Q. Okay. Who asked you to prepare that?

12 A. HR.

13 Q. Okay. And what instructions were you given
14 on preparing a mission statement?

15 A. I don't think there was any instructions.
16 It was just prepare a mission statement.

17 Q. Like a personal mission statement?

18 A. Correct.

19 Q. Okay. All right. Now, in this lawsuit, you
20 have alleged a claim under the Americans with
21 Disabilities Act. What is the disability you're
22 claiming?

23 A. My geriatric pregnancy.

24 Q. Okay. And did you ever tell anyone at
25 Ramsey that you had a disability?

1 A. When I reported my pregnancy to Armando.

2 Q. What did you tell Mr. Lopez?

3 A. That I requested -- well, maybe I can pull
4 up the email. (Witness reviews document.)

5 I said -- so I stated, "I'm not sure what my
6 next steps are regarding the sharing the news with my
7 leader, getting FMLA & ADA paperwork incase it's needed
8 in the future, etc."

9 Q. So is that the only email where you mention
10 the ADA?

11 A. Correct.

12 Q. Did you have any discussion with anyone at
13 Ramsey about your disability?

14 A. I was terminated before I had any
15 discussions with anyone outside of HR.

16 Q. In the conversation with Suzanne Simms on
17 the phone, did you mention your disability?

18 A. I don't recall the nature of the
19 conversation I had with Suz.

20 Q. In the meeting with Suzanne Simms and Jen --
21 Jen Sievertsen, did you tell them what your disability
22 was?

23 A. I don't recall the whole conversation.

24 Q. And then what about the third meeting
25 with -- which was with Suzanne Simms and Armando Lopez,

1 did you tell them what your disability was?

2 A. I don't believe I did a lot of talking in
3 that meeting.

4 Q. Did you ever tell anyone at Ramsey that you
5 had a geriatric pregnancy?

6 A. The only people I reported my pregnancy to
7 was Armando.

8 Q. So is the answer no?

9 A. No.

10 Q. Okay. Who has treated you for the geriatric
11 pregnancy?

12 A. I had a team of doctors. I had to switch
13 OBs after I was terminated.

14 Q. And I realize this question is -- the answer
15 is probably pretty obvious, but do you still have the
16 disability?

17 A. No.

18 Q. Okay. Do you have any resulting disability
19 from the geriatric pregnancy?

20 A. No.

21 Q. Ms. O'Connor, in this -- in the discovery of
22 this lawsuit, the parties have exchanged
23 interrogatories and responded to each other's
24 questions, their interrogatories. In response to our
25 interrogatories, the interrogatory was: Explain how

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ERRATA PAGE

I, CAITLIN O'CONNOR, the witness herein, have read the transcript of my testimony and the same is true and correct, to the best of my knowledge, with the exception of the following changes noted below, if any:

Page/Line	Change
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Reason

CAITLIN O'CONNOR

Sworn to and subscribed before me, this
the day of _____, 2021.

Notary Public
My Commission Expires:

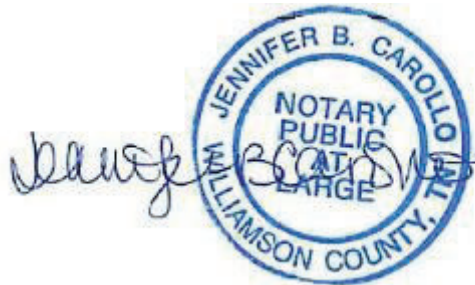
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REPORTER'S CERTIFICATE

I, Jennifer B. Carollo, Licensed Court Reporter, Registered Professional Reporter, Certified Court Reporter, and Notary Public for the State of Tennessee, hereby certify that I reported the foregoing proceedings at the time and place set forth in the caption thereof; that the proceedings were stenographically reported by me; and that the foregoing proceedings constitute a true and correct transcript of said proceedings to the best of my ability.

I FURTHER CERTIFY that I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome or events of this action.

IN WITNESS WHEREOF, I have hereunto affixed my official signature and seal of office this 24th day of June, 2021.



JENNIFER B. CAROLLO, LCR, RPR, CCR
AND NOTARY PUBLIC FOR THE STATE
OF TENNESSEE

LCR No. 432, Expires 6/30/2022

Notary Commission Expires 6/26/2024

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